

# CCTV PRIVACY NOTICE

#### **1 GENERAL PROVISIONS**

This document provides information on the method employed by **DHL Supply Chain**, i.e. the companies DHL Supply Chain s.r.o., DHL Solutions k.s. and DHL Automotive s.r.o. (hereinafter referred to as the "**DHL Supply Chain Division**" or "**we**") to process personal data concerning natural persons entering the premises monitored by the camera monitoring system and persons registered in a different way when they enter our buildings or premises through the operation of the camera monitoring system and other security measures, and on the method employed to treat and protect such data.

The purpose of this Notice of the CCTV Privacy Notice (hereinafter referred to as the "Privacy Notice") is to inform you of the method that we employ to collect and process your personal data related to the operation of the camera monitoring system and to inform you of your rights and the way in which you can exercise such rights (chapter 7 below).

We strongly recommend that you carefully familiarise yourself with this Privacy Notice. In case of any questions, do not hesitate to contact us at any time using the contact details provided below.

In the event of inconsistency or discrepancy between the Czech version and any of the other linguistic versions of this document, the Czech language version shall prevail.

#### 2 PERSONAL DATA CONTROLLER AND CONTACT DETAILS

The Controller of your personal data is one or more of the following companies depending on the buildings and premises of the DHL Supply Chain Division that you enter:

- DHL Supply Chain s.r.o., with its registered office at Loděnická 963, ZIP 691 23, Pohořelice, incorporated in the Commercial Register administered by the Regional Court in Brno, File No. C 43542, ID No.: 492 40 650
- DHL Solutions k.s., with its registered office at Nádražní 2967/93, Moravská Ostrava, ZIP 702 00, Ostrava, incorporated in the Commercial Register administered by the Regional Court in Ostrava, File No. A 20956, ID No.: 282 13 866
- DHL Automotive s.r.o., with its registered office at Nepřevázka 153, ZIP 293 01, incorporated in the Commercial Register administered by the Municipal Court in Prague, File No. C 56691, ID No.: 256 34 917

Contact details for any personal data protection concerns are as follows:

E-mail: dsccz.dp@dhl.com

Address: DHL Data Protection Loděnická 963 ZIP 691 23, Pohořelice



## 3 PURPOSE AND LEGAL BASIS OF THE PROCESSING

We process your personal data via the camera monitoring system and utilise video surveillance footage in order to protect our property and ensure occupational safety and the safety of other persons present in our buildings and on our premises.

## 4 THE CAMERA MONITORING SYSTEM (CCTV)

The Camera Monitoring System (CCTV) is installed in all buildings on the DHL Supply Chain Division premises in areas that are designated for camera monitoring.

The Camera Monitoring System (CCTV) is comprised of cameras that monitor the outdoor areas of the buildings and premises, handling areas, entrance doors, gates and driveways leading the premises. The cameras are installed in a manner that allows for the areas to be monitored and recorded without excessively disturbing the right to privacy of persons being monitored. The premises being monitored and recorded by cameras are designated with a camera pictogram.

The cameras record colour surveillance footage on a continuous basis. Personal data included in video surveillance footage recorded by the cameras is retained on the recording device for a period not exceeding 30 days allowing us any possible incident to be investigated together with collecting other information necessary for the handover of the video surveillance footage to the bodies responsible for criminal proceedings or insurance company, provided that this is required for the protection of our legitimate interests while adhering to handover conditions compliant with the current interpretation of relevant legislation. Upon the expiry of this time limit, surveillance footage is thereby deleted and rewritten in a loop. Certain parts of the records (including personal data contained therein) may be retained on a selective basis for a longer period to determine, exercise or defend our legal claims or on the grounds of our legitimate interest.

## 5 SHARING AND TRANSFERRING PERSONAL DATA (TO THE RECIPIENTS OF PERSONAL DATA)

Video surveillance footage from the camera monitoring system may only be disclosed to bodies responsible for criminal proceedings, courts or administrative authorities for the purposes of administrative or criminal proceedings.

In exceptional cases, we can disclose the video surveillance footage with attorney-at-laws or insurance companies to protect our legal interests if instructed by the company management.

External providers and supervisors of camera monitoring systems (CCTV) may now and then inspect the video surveillance footage based on our express instruction to do so in the case of failures and where technical interventions are required. Access and intervention of such persons is monitored and regulated by concluded agreements on personal data processing that guarantee at least the same level of data protection as this Privacy Notice.

## 6 DATA SECURITY

We have put in place and maintain adequate technical and organisational measures, internal information security controls and processes in line with best business practice corresponding to the potential risk for you as a data subject. At the same time, we take into account the state of technological development in order to protect your personal data from accidental loss, destruction, alteration, unauthorised disclosure or access. These measures may include, but are not limited to, taking reasonable steps to ensure the responsibility of the relevant employees having access to your data, employee training, regular backups, data recovery procedures and incident management, and software protection of devices on which personal data is stored etc.

## 7 YOUR RIGHTS AS A DATA SUBJECT

If you wish to exercise any of the undermentioned rights of yours and/or obtain relevant information, please contact us using the contact details provided in Article 2 above.



We will respond within one month from the date on which we receive your request and we reserve the right to extend the time limit by two months.

#### 7.1 Personal Data Disclosure

You have the right to request information on whether we process your personal data and to what extent. In addition, you have the right to request to be disclosed personal data that you have provided to us as well as other personal data concerning you as a person.

Considering the character of the processing, we can provide you with the information only if you provide us information based on which we can identify you on the video surveillance footage. Otherwise, we unfortunately cannot provide you with the required information. In addition, we reserve the right to refuse your request for access as unreasonable, particularly with the rights of third parties being affected.

A copy of your data recorded by the camera monitoring system (CCTV) will be provided only in cases where no rights and freedoms of third parties are affected and we can identify the part of the video surveillance footage containing your personal data based on information that you will provide to us. Third-party rights are affected in particular in cases where the requested part of video surveillance footage also includes the personal data of such third parties.

#### 7.2 **Processing Restriction**

If you ask us to limit the processing of your personal data, for example, when you question the accuracy, legality or our need to process your personal data, we will limit the processing of your personal data to the minimum necessary (storage) and will only process it for determination, performance or defence of legal claims, or for the protection of the rights of another natural or legal person, or for other limited reasons prescribed by applicable laws. If the restrictions are cancelled and we continue to process your personal data, we will inform you without undue delay.

## 7.3 Right to Object and Right to Erasure

We process your personal data based on our legitimate interest to protect our property and ensure the security of our buildings. Therefore, you have the right to object to such processing for a reason concerning your specific situation. If in such a case, we are not able to demonstrate our serious legitimate reasons that outweigh your interests or rights and freedoms or if we fail to demonstrate that such data is necessary for the determination, execution and defence of our legal claims, we will no longer process such data and we will erase it without any undue delay.

## 7.4 Complaint at the Office for Personal Data Protection

You have the right to file a complaint regarding our processing of data with the Personal Data Protection Office, Pplk. Sochora 27, ZIP 170 00 Prague 7. Official website <u>www.uoou.cz</u>.

## 8 UPDATES TO THE PRIVACY NOTICE

We are authorised to amend or update the Privacy Notice on a continuous basis. Any amendments of this Privacy Notice become effective upon their publication in the amended Privacy Notice, which can be found:

- 1) At the receptions of each individual premises
- 2) On the company SharePoint Online: https://dpdhl.sharepoint.com/sites/dsccz-gdpr
- 3) Yellow Corners (informative boards) of individual branches
- 4) https://www.logistics.dhl/cz-en/home/our-divisions/supply-chain/about-dhl-supply-chain.html